

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,**

**Plaintiff,**

**V.**

**THE HEARTLAND GROUP VENTURES, LLC; HEARTLAND PRODUCTION AND RECOVERY LLC; HEARTLAND PRODUCTION AND RECOVERY FUND LLC; HEARTLAND PRODUCTION AND RECOVERY FUND II LLC; THE HEARTLAND GROUP FUND III, LLC; HEARTLAND DRILLING FUND I, LP; CARSON OIL FIELD DEVELOPMENT FUND II, LP; ALTERNATIVE OFFICE SOLUTIONS, LLC; ARCOOIL CORP.; BARRON PETROLEUM LLC; JAMES IKEY; JOHN MURATORE; THOMAS BRAD PEARSEY; MANJIT SINGH (AKA ROGER) SAHOTA; and RUSTIN BRUNSON,**

**Defendants,**

**and**

**DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYIPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.; LEADING EDGE ENERGY, LLC; SAHOTA CAPITAL LLC; and 1178137 B.C. LTD.,**

### Relief Defendants.

**No. 4-21CV-1310-O**

**RECEIVER'S WITNESS AND EXHIBIT LIST FOR HEARING  
ON JANUARY 19, 2022 AT 9:00 A.M. CENTRAL**

Deborah D. Williamson (the "Receiver"), the Court-appointed Receiver in the above-captioned case, through undersigned counsel files this *Witness and Exhibit List for Hearing on January 19, 2022 at 9:00 a.m. Central*.

**WITNESSES**

The Receiver may call the following witnesses at the hearing:

1. Deborah D. Williamson, solely in her capacity as Receiver.

The Receiver reserves the right to call or not call any witnesses designated by any other party, any person attending the telephonic hearing, as well as any rebuttal witnesses.

**EXHIBITS**

The Receiver designates the following exhibits that may be admitted:

EXHIBIT NUMBER	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
1.	12 22 2021 Kelley Blue Book Instant Cash Offer for 2019 F250 (Attached)						
2.	12 22 2021 Kelley Blue Book Instant Cash Offer for 2020 F150 (Attached)						
3.	12 22 2021 Kelley Blue Book Instant Cash Offer for 2020 Ram 2500 (Attached)						
4.	Terms and Conditions of Kelley Blue Book Instant Cash Offer System (Attached)						
5.	1 10 2022 Notice of Hearing (ECF No. 97)						

The Receiver reserves the right to use any exhibits presented by any other party. The Receiver also reserves the right to use and/or present demonstratives for any purpose. The Receiver also reserves the right to use exhibits, demonstratives, and testimony not listed here for impeachment or rebuttal purposes at the hearing.

The Receiver reserves the right to supplement or amend this Witness and Exhibit List any time prior to the hearing. Any party wishing to receive a copy of any of the foregoing exhibits should email Danielle N. Rushing at [drushing@dykema.com](mailto:drushing@dykema.com). Requested exhibits will be provided by electronic transmission.

Dated: January 17, 2022

Respectfully submitted,

By: Deborah D. Williamson

*(Receiver)*

State Bar No. 21617500

dwilliamson@dykema.com

**DYKEMA GOSSETT PLLC**

112 East Pecan Street, Suite 1800

San Antonio, Texas 78205

Telephone: (210) 554-5500

Facsimile: (210) 226-8395

/s/ Jeffrey R. Fine

Jeffrey R. Fine

State Bar No. 07008410

jfine@dykema.com

Alison R. Ashmore

State Bar No. 24059400

aashmore@dykema.com

**DYKEMA GOSSETT PLLC**

1717 Main Street, Suite 4200

Dallas, Texas 75201

Telephone: (214) 462-6400

Facsimile: (214) 462-6401

and

Danielle N. Rushing

State Bar No. 24086961

drushing@dykema.com

**DYKEMA GOSSETT PLLC**

112 East Pecan Street, Suite 1800

San Antonio, Texas 78205

Telephone: (210) 554-5500

Facsimile: (210) 226-8395

and

Rose L. Romero

State Bar No. 17224700

Rose.Romero@RomeroKozub.com

**LAW OFFICES OF ROMERO | KOZUB**

235 N.E. Loop 820, Suite 310

Hurst, Texas 76053

Telephone: (682) 267-1351

**COUNSEL TO RECEIVER**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2022, the foregoing and all corresponding exhibits were served via CM/ECF and via email on the following:

Jonathan S. Polish  
[PolishJ@SEC.GOV](mailto:PolishJ@SEC.GOV)  
Stephanie L. Reinhart  
[reinharts@SEC.GOV](mailto:reinharts@SEC.GOV)

***Counsel to Plaintiff  
U.S. Securities and Exchange Commission***

James Ikey  
[james.ikeyrcg@gmail.com](mailto:james.ikeyrcg@gmail.com)

Bridy Ikey  
[bridydikey@gmail.com](mailto:bridydikey@gmail.com)

***Unrepresented Defendants***

Alex More  
[amore@ccsb.com](mailto:amore@ccsb.com)

Theodore Grannatt  
[tgrannatt@mccarter.com](mailto:tgrannatt@mccarter.com)

J. Kevin Edmundson  
[Kevin@eswpllc.com](mailto:Kevin@eswpllc.com)

***Counsel to Various Defendants***

/s/ Jeffrey R. Fine

**EXHIBIT 1**

## Fine, Jeffrey

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**From:** Kelley Blue Book <reply@messages.kbb.com>  
**Sent:** Wednesday, December 22, 2021 3:50 PM  
**To:** Fine, Jeffrey  
**Subject:** Your Instant Cash Offer is ready to be redeemed!

\*\*\* EXTERNAL \*\*\*

This is an automated response. If you need to contact us, please use the Email link below.



## Instant Cash Offer

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# Congratulations, Jeffrey

Participating Dealers are interested in your:

**2019 Ford F250 Super Duty Crew Cab**

[Review vehicle details](#)

Your Kelley Blue Book® Instant Cash Offer

# \$72,630

This offer can only be redeemed at a Participating Dealer. Kelley Blue Book doesn't redeem offers, purchase vehicles or own/operate Participating Dealers.

Offer good until: 12/29/2021

Offer ID: 6a068b55-b290-4bdc-a00a-1368c253b2f5

Email: [jfine@dykema.com](mailto:jfine@dykema.com)

ZIP Code: 75201

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## Next Steps



## Choose Where To Redeem Your Offer

These dealers may contact you about your offer.


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### Sport City Toyota

12650 Lyndon B. Johnson Freeway,  
Dallas, TX 75228

 **Acquisition Team**

 **(877) 290-7878**


 **sportcitytoyota.com**



### Westway Ford

801 W Airport Fwy,  
Irving, TX 75062

 **Vehicle Acquisition  
Manager**

 **(817) 310-9010**

 **westwayford.com**

2

## Prepare for Your Visit

To save time at the dealer, have these handy.

- **Your Offer Confirmation**  
(on your phone or printed)
- **Vehicle Title, aka "Pink Slip"**  
(if the vehicle is paid off)
- **Payoff or Leasing Info**  
(if the vehicle isn't paid off yet)
- **Vehicle Registration**
- **Valid Driver's License or Govt. ID**
- **Proof of Insurance**  
(if you're buying another car)
- **All Keys, Remotes and Manuals**
- **Maintenance & Repair Records**

Remember to remove all personal belongings and if you're not buying another car, arrange for a ride home.

3



## Visit the Dealer & Review the Offer

The dealer you choose will inspect your vehicle using the same questions you used at home.

Your Assessment	The Dealer's Review
<hr/>	<input checked="" type="checkbox"/> Updates
<hr/>	<input checked="" type="checkbox"/> <hr/>
<hr/>	<hr/>
<hr/>	<input checked="" type="checkbox"/> <hr/>
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<input checked="" type="checkbox"/> <hr/>
<hr/>	<hr/>

### Ask for the Side-by-Side View

You may not have caught everything when going through your car's condition. That's OK. After their inspection, the dealer will show you a side-by-side comparison so you can agree on what's fair.



## Redeem Your Offer

You get cash or trade-in credit. It's your choice!



Not all vehicles are eligible for an Instant Cash Offer. The Offer may be less than the Kelley Blue Book® Trade-In Value or Range. Kelley Blue Book does not redeem Offers, purchase vehicles or own/operate Participating Dealers. Dealer inspection required. If the

info you provide about the vehicle differs from the dealer inspection, the Offer amount may be decreased. Kelley Blue Book and its affiliates are not responsible for Offer adjustments or if a Participating Dealer won't accept your vehicle. Dealers pay a fee to participate in the Kelley Blue Book Instant Cash Offer program. [Program Terms and Conditions apply](#)

We're here to help: [1-866-559-5268](#)  
Mon - Fri: 8 a.m. - 8 p.m. EST: Sat: 9 a.m. - 7 p.m. EST  
[FAQs](#) [Email](#)

**EXHIBIT 2**

## Fine, Jeffrey

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**From:** Kelley Blue Book <reply@messages.kbb.com>  
**Sent:** Wednesday, December 22, 2021 3:38 PM  
**To:** Fine, Jeffrey  
**Subject:** Your Instant Cash Offer is ready to be redeemed!

\*\*\* EXTERNAL \*\*\*

This is an automated response. If you need to contact us, please use the Email link below.



## Instant Cash Offer

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# Congratulations, Jeffrey

Participating Dealers are interested in your:

**2020 Ford F150 SuperCrew Cab**

[Review vehicle details](#)

**Your Kelley Blue Book® Instant Cash Offer**

# \$44,265

This offer can only be redeemed at a Participating Dealer. Kelley Blue Book doesn't redeem offers, purchase vehicles or own/operate Participating Dealers.

**Offer good until: 12/29/2021**

Offer ID: 3156cbab-3153-4d2f-8e71-5b0f11ffd714

Email: [jfine@dykema.com](mailto:jfine@dykema.com)

ZIP Code: 75201

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## Next Steps



## Choose Where To Redeem Your Offer

These dealers may contact you about your offer.

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**Sewell INFINITI of Dallas**

7110 Lemmon Ave,  
Dallas, TX 75209



**ALEXIS SACKETT OR  
MARCO CHINCARINI**

 **(972) 455-0736**



**sewellinfiniti-  
dallas.com**




**Westway Ford**

801 W Airport Fwy,  
Irving, TX 75062



**Vehicle Acquisition  
Manager**

 **(817) 310-9010**



**westwayford.com**

**2**

## Prepare for Your Visit

To save time at the dealer, have these handy.

- **Your Offer Confirmation**  
(on your phone or printed)
- **Vehicle Title, aka "Pink Slip"**  
(if the vehicle is paid off)
- **Payoff or Leasing Info**  
(if the vehicle isn't paid off yet)
- **Vehicle Registration**
- **Valid Driver's License or Govt. ID**
- **Proof of Insurance**  
(if you're buying another car)
- **All Keys, Remotes and Manuals**
- **Maintenance & Repair Records**

Remember to remove all personal belongings and if you're not buying another car, arrange for a ride home.

3

## Visit the Dealer & Review the Offer

The dealer you choose will inspect your vehicle using the same questions you used at home.

Your Assessment	The Dealer's Review
	<input checked="" type="checkbox"/> Updates
	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>

### Ask for the Side-by-Side View

You may not have caught everything when going through your car's condition. That's OK. After their inspection, the dealer will show you a side-by-side comparison so you can agree on what's fair.

4

## Redeem Your Offer

You get cash or trade-in credit. It's your choice!



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We're here to help: [1-866-559-5268](tel:1-866-559-5268)  
Mon - Fri: 8 a.m. - 8 p.m. EST: Sat: 9 a.m. - 7 p.m. EST  
[FAQs](#) [Email](#)

**EXHIBIT 3**



## Fine, Jeffrey

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**From:** Kelley Blue Book <reply@messages.kbb.com>  
**Sent:** Wednesday, December 22, 2021 2:24 PM  
**To:** Fine, Jeffrey  
**Subject:** Your Instant Cash Offer is ready to be redeemed!

\*\*\* EXTERNAL \*\*\*

This is an automated response. If you need to contact us, please use the Email link below.



## Instant Cash Offer

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# Congratulations, Jeffrey

Participating Dealers are interested in your:

**2020 Ram 2500 Crew Cab**

[Review vehicle details](#)

Your Kelley Blue Book® Instant Cash Offer

# \$72,439

This offer can only be redeemed at a Participating Dealer. Kelley Blue Book doesn't redeem offers, purchase vehicles or own/operate Participating Dealers.

Offer good until: 12/29/2021

Offer ID: 0c001cdf-069b-4b87-aa86-5420817d90a1

Email: [jfine@dykema.com](mailto:jfine@dykema.com)

ZIP Code: 75201

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## Next Steps



## Choose Where To Redeem Your Offer

These dealers may contact you about your offer.


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### **Cowboy Toyota**

9525 East R L Thornton Freeway,  
Dallas, TX 75228

 **James Norman,**  
**Acquisition Specialist**

 **(469) 206-5568**


 **cowboytoyota.com**



### **Town East Ford**

18411 Lyndon B Johnson Freeway,  
Mesquite, TX 75150

 **Vehicle Acquisition Team**

 **(214) 446-2904**

 **towneastford.com**

**2**

## **Prepare for Your Visit**

To save time at the dealer, have these handy.

- **Your Offer Confirmation**  
(on your phone or printed)
- **Vehicle Title, aka "Pink Slip"**  
(if the vehicle is paid off)
- **Payoff or Leasing Info**  
(if the vehicle isn't paid off yet)
- **Vehicle Registration**
- **Valid Driver's License or Govt. ID**
- **Proof of Insurance**  
(if you're buying another car)
- **All Keys, Remotes and Manuals**
- **Maintenance & Repair Records**

Remember to remove all personal belongings and if you're not buying another car, arrange for a ride home.

**3**

## Visit the Dealer & Review the Offer

The dealer you choose will inspect your vehicle using the same questions you used at home.

Your Assessment	The Dealer's Review
<hr/>	<input checked="" type="checkbox"/> Updates
<hr/>	<input checked="" type="checkbox"/> <hr/>
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<hr/>	<input checked="" type="checkbox"/> <hr/>
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### Ask for the Side-by-Side View

You may not have caught everything when going through your car's condition. That's OK. After their inspection, the dealer will show you a side-by-side comparison so you can agree on what's fair.



## Redeem Your Offer

You get cash or trade-in credit. It's your choice!



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We're here to help: [1-866-559-5268](tel:1-866-559-5268)  
Mon - Fri: 8 a.m. - 8 p.m. EST: Sat: 9 a.m. - 7 p.m. EST  
[FAQs](#) [Email](#)

**EXHIBIT 4**



# An Official Offer to Buy Your Car

## Tell Us About Your Car

Your License Plate or VIN helps us fill in key details about your vehicle and ensures a more accurate offer.

License Plate

**VIN**

Enter the 17-digit VIN

Go

[Where is my VIN?](#)



Not all vehicles are eligible for an Instant Cash Offer. The Offer may be less than the Kelley Blue Book® Trade-In Value or Range. Kelley Blue Book does not redeem Offers, purchase vehicles or own/operate Participating Dealers. Dealer inspection required. If the info you provide about the vehicle differs from the dealer inspection, the Offer amount may be decreased. Kelley Blue Book and its affiliates are not responsible for Offer adjustments or if a Participating Dealer won't accept your vehicle. Dealers pay a fee to participate in the Kelley Blue Book Instant Cash Offer program. [Program Terms and Conditions](#) apply.

## How does Instant Cash Offer work?



### Tell Us About Your Car.

Tell us your car's specific features and condition.

### Get the Instant Cash Offer.

Find out what you can get for your car today. Offers are good for 7 days.



### Choose a Participating Dealer.

Bring in your car and offer. They'll verify the offer using the same questions you answered at home.

### Get Cash or Trade-In Credit.



The offer is the same whether you sell or trade in.



## Frequently Asked Questions

### My Instant Cash Offer ^

#### What is a Kelley Blue Book® Instant Cash Offer? ^

The Kelley Blue Book® Instant Cash Offer is a real offer for a specific amount to purchase a consumer's car or apply the amount toward another car. The Offer is valid for 7 days and can be immediately redeemed during business hours at any Participating Dealer, pending inspection. It is based on specific elements of the consumer's car, like installed options, specific condition (such as dents and mechanical issues) and local market demand.

#### How is my Instant Cash Offer calculated? ^

Your Instant Cash Offer is calculated using a proprietary tool that accounts for fluctuating market conditions and used car prices that may vary from day to day, like home or stock prices. The calculation includes multiple data sources and is based on factors that affect used car pricing such as:

- **Your Specific Vehicle Details**

Our tool factors in details that are specific to your vehicle and critical to its evaluation, including mechanical condition, options, interior and exterior, mileage, year, make and model.

- **Supply and Demand**

Consumers have a large role in determining a car's value. When more buyers demand a particular vehicle, and its inventory is down, the value goes up. For example, when gas prices are at a premium, fuel-efficient vehicles may be in higher demand and sell for higher prices.

- **Historical Trends**

Historically, some cars hold their value and are in higher demand than others. Similarly, sometimes transaction prices for vehicles steadily increase over time, making those cars a more sought after commodity.

- **Regional Differences**

Buyers may be willing to pay sellers higher prices for the same vehicle depending on regional differences. For example, buyers in rural areas may consider large trucks more valuable than buyers in a city where parking spaces are tight.

- **Local Market Influences**

We also take into account comparable vehicle sales in your area - this information may include dealer sales data, auction prices, and private seller prices from local advertisements.

#### Am I obligated to redeem my Instant Cash Offer? ✓

#### How is an Instant Cash Offer different from Trade-in Value Range? ^

The Kelley Blue Book® Instant Cash Offer is:

- Valid for 7 days
- Offer can be applied toward your next car purchase or used to sell your current car to a Participating Dealer (pending inspection)
- No need to negotiate because each offer is a fixed amount
- Based on specific details related to the condition and features of your car, like installed options, dents, mechanical issues, and local market demand

## **The Kelley Blue Book® Trade-In Value is:** ∨

## **How much does it cost to receive an Instant Cash Offer?** ^

It's free! There is no fee to obtain or redeem the Offer.

## **Do I have to purchase a car with my Instant Cash Offer?** ^

No. You can walk away with a check in hand or use the Offer towards the purchase of another vehicle.

## **How long is my Instant Cash Offer valid for?** ^

Your Instant Cash Offer is valid for 7 days. After that time, you can resubmit your request, but your Offer amount may change.

## **How long do I have to accept my Offer after inspection?** ∨

## **How long will it take to receive my Instant Cash Offer?** ∨

## **What if the Participating Dealer I go to won't match the amount on my Instant Cash Offer?** ^

Participating Dealers are required to honor your Instant Cash Offer, provided the information and condition you provided when creating your Offer are confirmed to be accurate by the Participating Dealer. If the information is not correct, the Participating Dealer can update the information using the same online tool you used to generate the Instant Cash Offer for your car, and the update may result in a modified Offer amount. So, the more details you enter about the condition of your car, the more accurate your Offer will be.

## **Why do offers fall out of Trade-in Value Range?** ∨

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## **My Car** ∨

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## **Dropping Off My Car** ^

### **Where do I take my car to redeem my Instant Cash Offer?** ^

Take your car to a Participating Dealer to verify its condition and redeem your Instant Cash Offer. We'll provide you with a list of Participating Dealers, and you're free to choose which to visit.

### **How far away will the dealer be?** ^

We'll do our best to identify Participating Dealers in your metro area.

### **What information should I bring when I drop off my car?** ^

To finalize the sale, bring the following information to a Participating Dealer:

- Your Instant Cash Offer certificate



- Your vehicle title. If you don't have a title because your car is financed, bring your lienholder information. If your car is leased, check with your leasing company to find out what paperwork they require.
- Your vehicle registration
- A valid driver's license or other government photo ID
- All keys, keyless remotes and manuals
- Service and repair records

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## Contact Us ^

### How do I contact Kelley Blue Book® about my offer? ^

If you have more questions, please email [Customer Support](#) anytime. You can also contact us at [\(866\) 559-5268](#), Monday through Friday from 8 a.m. to 8 p.m. or Saturday from 9 a.m. to 6 p.m. eastern time.

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Kelley Blue Book is here to help: [866-559-5268](#)  
Mon - Fri: 8 a.m. - 8 p.m. ET, Sat: 9 a.m. - 6 p.m. ET  
[FAQs](#)   [Email Kelley Blue Book](#)

**EXHIBIT 5**

**JUDICIAL NOTICE OF *NOTICE OF HEARING* FILED JANUARY 10, 2022  
AS ECF NO. 97**